

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW MEXICO**

**JOLEEN YOUNGERS, as personal representative of
the ESTATE OF JASMINE WILLIAMS; TONYA
PETRIDES; and TONYA PETRIDES as next friend
of M.R.,**

Plaintiffs,

vs.

**CORECIVIC, INC.; CORECIVIC, LLC;
CORECIVIC OF TENNESSEE, LLC; ROBERT
NILIUS; WILLIAM SNODGRASS; OFFICER
DEHIYA; OFFICER V. BECENTI; OFFICER F.
CHINO; OFFICER JOSHUA ARAGON; OFFICER
L. KENNETH; OFFICER K. BROWN; OFFICER
DAVID COLE; OFFICER CHAVEZ; OFFICER
SARRACINO; OFFICER HAYES; OFFICER
DAVID ROBERTS; LIEUTENANT JARAMILLO; J.
DOES 1-15; NATALIE GRINE, in her individual and
official capacity as Cibola County's records custodian;
ANNA MARIE LOPEZ, in her individual and official
capacity as Cibola County Sheriff's Office's records
custodian; JACOB LEE, in his individual and official
capacity as records custodian of the Cibola County,
Cibola County Correctional Center, CoreCivic LLC,
CoreCivic of Tennessee, LLC, CoreCivic, Inc.; and
STRUCK LOVE BOJANOWSKI & ACEDO PLC,**

Defendants.

No. 1:25-cv-00012-SCY-JFR

NOTICE OF CONSENT TO AND JOINDER IN NOTICE OF REMOVAL

Defendant Natalie Grine notifies the Court that she consents to and joins in the removal of this matter to federal court,¹ which was removed under 28 U.S.C. § 1442(a)(1).

¹ By consenting to and joining in the removal, Ms. Grine does not waive, but explicitly reserves, the right to challenge venue should this matter be remanded to state court.

Plaintiffs filed this lawsuit in the State of New Mexico, County of Santa Fe, First Judicial District, Case No. D-101-CV-2024-02751 on November 12, 2024. (Dkt. 1 at 2.) CoreCivic Defendants were served on November 26, 2024, and SLBA Defendants were served on December 2, 2024. (*Id.*) Plaintiffs served Defendant Grine on December 6, 2024. (*Id.*) CoreCivic Defendants and SLBA Defendants removed this matter pursuant to 28 U.S.C. § 1442(a)(1) on January 6, 2025. (*Id.* at 1, 6.)

Defendant Grine consents to and joins in the removal pursuant to 28 U.S.C. § 1446.

Dated: January 22, 2025

/s/ Daniel P. Struck

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Attorneys for Defendants CoreCivic, Inc, CoreCivic, LLC, CoreCivic of Tennessee, LLC, Jacob Lee, Struck Love Bojanowski & Acedo, PLC, and Natalie Grine

CERTIFICATE OF SERVICE

I hereby certify that on January 22, 2025, I electronically transmitted the attached document to the Clerk's Office using the CM/ECF System for filing and transmittal of a Notice of Electronic Filing to the following CM/ECF registrants:

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/s/ Kim Penny_____